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[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON

CYNTHIA HARVEY, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

CENTENE MANAGEMENT
COMPANY, LLC and COORDINATED
CARE CORPORATION,

Defendants.

NO. 2:18-cv-00012-SMJ

**DECLARATION OF BETH E.
TERRELL IN SUPPORT OF
PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION**

I, Beth E. Terrell, declare as follows:

1. I am a member of the law firm of Terrell Marshall Law Group PLLC
("TMLG"), counsel of record for Plaintiffs in this matter. I am admitted to practice

1 before this Court and am a member in good standing of the bars of the states of
2 Washington and California. I respectfully submit this declaration in support of
3 Plaintiff's Motion for Class Certification. Except as otherwise noted, I have
4 personal knowledge of the facts set forth in this declaration and could testify
5 competently to them if called upon to do so.

6 2. TMLG is a law firm in Seattle, Washington, that focuses on complex
7 civil and commercial litigation with an emphasis on consumer protection, product
8 defect, civil rights, employment, wage and hour, real estate, and personal injury
9 matters. The attorneys of TMLG have extensive experience in class actions,
10 collective actions, and other complex matters. They have been appointed lead or
11 co-lead class counsel in numerous cases at both the state and federal level. They
12 have prosecuted a variety of multi-million-dollar consumer fraud, civil rights,
13 wage and hour, and product defect class actions. The defendants in these cases
14 have included companies such as Wal-Mart, Microsoft, Best Buy, Toyota, Honda,
15 Sallie Mae, Comcast, ABM Industries, Inc., AT&T, T-Mobile USA,
16 Weyerhaeuser, Behr Products, American Cemwood, Bank of America, Discover
17 Financial Services, Capital One, and HSBC.

18 3. I am the lead attorney from TMLG in the instant litigation. A
19 founding member of TMLG, I concentrate my practice in complex litigation,
20 including the prosecution of consumer, defective product, and wage and hour class

1 actions. I have served as co-lead counsel on numerous multi-state and nationwide
2 class actions. I also handle a variety of employment issues including employment
3 discrimination, restrictive covenant litigation, and pre-litigation counseling and
4 advice.

5 4. I received a B.A., magna cum laude, from Gonzaga University in
6 1990. In 1995, I received my J.D. from the University of California, Davis School
7 of Law, Order of the Coif. Prior to forming TMLG in May 2008, I was a member
8 of Tousley Brain Stephens PLLC. I am a frequent speaker at legal conferences on a
9 wide variety of topics including consumer class actions, employment litigation,
10 and electronic discovery, and I have been awarded an “AV” rating in Martindale
11 Hubble by my peers.

12 5. I am actively involved in several professional organizations and
13 activities. For example, I currently am an Eagle Member of the Washington State
14 Association of Justice (“WSAJ”). I am the current Chair of the Washington
15 Employment Lawyers Association, Chair of the Northwest Consumer Law Center,
16 and President of the Public Justice Foundation.

17 6. I have been repeatedly named to the annual Washington Super
18 Lawyers list. I have also been named to the Top 100 Washington Super Lawyers
19 list and the Top 50 Women Super Lawyers list.

1 **A. Qualifications of Other TMLG Attorneys**

2 7. Jennifer Rust Murray is a founding member of TMLG. Ms. Murray
3 graduated from the University of Washington School of Law in 2005 where she
4 was a member of the Washington Law Review. Ms. Murray’s law review article
5 entitled “Proving Cause in Fact under Washington’s Consumer Protection Act: The
6 Case for a Rebuttable Presumption of Reliance” won the Carkeek prize for best
7 submission by a student author. Prior to law school, Ms. Murray earned a Ph.D. in
8 Philosophy from Emory University. Ms. Murray has been an active member of the
9 Washington State Bar Association since her admission to the bar in 2005. In 2010,
10 Ms. Murray was admitted to the Oregon State Bar. In 2011, 2012, 2013, 2014, and
11 2015, Ms. Murray was named a Washington “Rising Star” by SuperLawyer
12 Magazine. Ms. Murray focuses her practice on complex commercial litigation with
13 an emphasis on consumer and employment issues. She has been involved in nearly
14 every class action prosecuted by the firm.

15 8. Elizabeth A. Adams is a 2012 graduate of the UCLA School of Law,
16 where she received the Order of the Coif and served as a Comments Editor for the
17 UCLA Law Review. Ms. Adams has been an associate with TMLG since early
18 2015, and she concentrates her practice in complex litigation, including consumer
19 protection and civil rights class actions. Before joining TMLG, Ms. Adams served
20 as a law clerk to the Honorable Dean D. Pregerson, the Honorable George Wu, and

1 the Honorable John A. Kronstadt, all of the United States District Court for the
2 Central District of California.

3 **B. TMLG's Prosecution of This Action**

4 9. TMLG has invested numerous hours and advanced significant costs
5 into the investigation and prosecution of this case, and we have the ability and
6 intention to continue to pursue the case to a successful conclusion.

7 **C. Other Cases Litigated by TMLG**

8 10. TMLG has actively and successfully litigated consumer protection
9 and product liability class action lawsuits in California and throughout the United
10 States. TMLG is litigating or has recently settled the following consumer
11 protection class actions:

- 12 • *Gold, et al. v. Lumber Liquidators, Inc.*—Filed in 2014 on
13 behalf of consumers who purchased defective flooring.
14 TMLG represents a certified nationwide class of consumers
15 as well as six certified sub-classes of consumers in the states
16 of California, Illinois, West Virginia, Minnesota,
17 Pennsylvania, and Florida. The case is pending in the United
18 States District Court for the Northern District of California.
19 The parties have reached settlement valued at up to \$30
20 million. A request for preliminary approval of the settlement
is currently pending before the court.
- *Jordan v. Nationstar Mortgage, LLC*— TMLG represented a
class of over 5,000 homeowners who were improperly
locked out of their homes by their mortgage lender. The
United States District Court for the Eastern District of

1 Washington granted final approval of \$17 million settlement
2 in May 2019.

- 3 • *Breazeale, et al. v. Victim Services, Inc., et al.*— Filed in
4 2014 on behalf of California consumers who received false,
5 misleading, and deceptive debt collection letters printed on
6 the letter head of county prosecuting attorneys. The case has
7 been certified as a class action and is pending in the United
8 States District Court for the Northern District of California.
- 9 • *Dibb, et al. v. AllianceOne Receivables Management, Inc.*—
10 TMLG represented three certified classes of Washington
11 consumers who received unfair and deceptive debt
12 collection notices that included threats of criminal
13 prosecution. The case settled on a class-wide basis for
14 \$1,900,000 in March 2017, and final approval was granted
15 in July 2017.
- 16 • *Cavnar, et al. v. BounceBack, Inc.*—Filed in 2014 on behalf
17 of Washington consumers who received false, misleading,
18 and deceptive debt collection letters printed on the letter
19 head of county prosecuting attorneys. TMLG worked to
20 negotiate a class-wide settlement, and final approval was
granted in September 2016.
- *Soto v. American Honda Motor Corporation*—Filed in 2012
on behalf of owners and lessees of 2008-2010 Honda
Accords that consume motor oil at a much higher rate than
intended, due to a systemic design defect. The case settled
on a class-wide basis and final approval was granted in
March 2014.
- *Smith v. Legal Helpers Debt Resolution LLC*—Filed in 2011
on behalf of consumers who were charged excessive fees for
debt adjusting services in violation of Washington law.
Class settlements were approved by the Court in December
2012 and December 2013.
- *Brown v. Consumer Law Associates LLC, et al.*—Filed in
2011 on behalf of consumers who were charged excessive

1 fees for debt adjusting services in violation of Washington
2 law. A class settlement was approved by the Court in 2013.

- 3 • *Bronzich, et al. v. Persels & Associates, LLC, et al.*—Filed
4 in 2010 on behalf of consumers who were charged excessive
5 fees for debt adjusting services in violation of Washington
6 law. A class settlement was approved by the Court in 2013.
- 7 • *Milligan, et al. v. Toyota Motor Sales, Inc.*—Filed in 2009
8 on behalf of owners of 2001-2003 Toyota RAV4s
9 containing defective Electronic Computer Modules, which
10 cause harsh shifting conditions and permanent damage to the
11 transmissions. TMLG worked to negotiate a nationwide
12 class action settlement, and final approval was granted in
13 January 2012.
- 14 • *Kitec Consolidated Cases*—Served as co-counsel in a
15 national class action lawsuit against the manufacturers of
16 defective hydronic heating and plumbing systems. The case
17 settled for \$125,000,000, and final approval was granted in
18 2011.
- 19 • *Seraphin v. AT&T Internet Services, Inc., et al.*—A multi-
20 state class action filed in 2009 on behalf of AT&T internet
customers who paid \$20 a month or less for internet service
and were assessed and Early Termination Fee when they
cancelled service. A class settlement was approved by the
Court in 2011.

11. My co-counsel, Seth Lesser, and his firm, Klafter Olsen & Lesser LLP
("KOL") have extensive experience representing consumers in class actions
throughout the United States. Details are included in Exhibit 57 attached hereto,
which contains a copy of his current CV and the firm's resume. In short, as to Seth,
for over 20 years he has represented plaintiffs in individual, class, and collective

1 actions, including specifically consumer cases. As a result, he has obtained
2 settlements in excess of a quarter of a billion dollars for consumers; was the
3 National Association of Consumer Advocates' Attorney of the Year in 2005 and
4 was Co-Chair of the Board of Directors of that organization from 2008 through
5 2013; Mr. Lesser is a co-author and contributor the National Consumer Law
6 Center's noted Consumer Class Actions treatise; has been lead or co-lead in
7 numerous significant cases including, among others, has been appointed lead
8 counsel by federal judges in a number of MDL proceedings; and has been
9 appointed to and served on a number of professional committees for among others,
10 such groups as the American Bar Association, the Second Circuit Federal Bar
11 Council, and the American Law Institute (of which he was elected a member in
12 2008). Further information is contained in the attached CV.

13 12. Plaintiff and her counsel have already shown that they will vigorously
14 pursue these claims on behalf of the class. Plaintiff has assisted counsel with
15 investigating her claims and has responded to Centene's requests for production.

16 13. Attached hereto as Exhibit 1 is a true and correct copy of an excerpt of
17 a spreadsheet named "Confidential Production - WA.CallType Member 2014-End
18 - 35 Requested Subcategory Codes.xlsb," labeled CCH050072. This document is
19 designated as "confidential" and has been filed under seal pursuant to the February
20 27, 2019 Order Adopting Stipulated Protective Order.

1 14. Attached hereto as Exhibit 2 is a true and correct copy of Complaint
2 Details submitted to the Office of Washington State Office of Insurance
3 Commissioner, labeled CCH228372. This document is designated as
4 “confidential” and has been filed under seal pursuant to the February 27, 2019
5 Order Adopting Stipulated Protective Order.

6 15. Attached hereto as Exhibit 3 is a true and correct copy of the
7 homepage of Centene’s website, located at www.centene.com and last visited
8 January 8, 2020.

9 16. Attached hereto as Exhibit 4 is a true and correct copy of the Centene
10 2018 Annual Review, available on Centene’s website at
11 <https://investors.centene.com/static-files/7fd238e4-7948-449f-ab69-005ca7bd4f5f>.

12 17. Attached hereto as Exhibit 5 is a true and correct copy of Centene’s
13 Form 10-Q, dated October 22, 2019.

14 18. Attached hereto as Exhibit 6 is a true and correct copy of excerpts
15 from the Deposition of Amy Condon, taken September 20, 2019.

16 19. Attached hereto as Exhibit 7 is a true and correct copy of Coordinated
17 Care Corporation’s Net Premium Revenue for year ending December 31, 2015.

18 20. Attached hereto as Exhibit 8 is a true and correct copy of Coordinated
19 Care Corporation’s Net Premium Revenue for year ending December 31, 2016.

1 21. Attached hereto as Exhibit 9 is a true and correct copy of Coordinated
2 Care Corporation's Net Premium Revenue for year ending December 31, 2017.

3 22. Attached hereto as Exhibit 10 is a true and correct copy of
4 Coordinated Care Corporation's Net Premium Revenue for year ending December
5 31, 2018.

6 23. Attached hereto as Exhibit 11 is a true and correct copy of
7 Coordinated Care's 2018 Evidence of Coverage, labeled CCH008366. This
8 document is designated as "confidential" and has been filed under seal pursuant to
9 the February 27, 2019 Order Adopting Stipulated Protective Order.

10 24. Attached hereto as Exhibit 12 is a true and correct copy of the
11 December 15, 2011 Consent Order Levying a Fine and Rescinding Notice of
12 Suspension Order No. 17-0475 and Cease and Desist Order No. 17-0474, labeled
13 CCH016492. This document is designated as "confidential" and has been filed
14 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
15 Order.

16 25. Attached hereto as Exhibit 13 is a true and correct copy of a January
17 19, 2018 document regarding Alternative Access Delivery Requests submissions to
18 the OIC , labeled CCH000510. This document is designated as "confidential" and
19 has been filed under seal pursuant to the February 27, 2019 Order Adopting
20 Stipulated Protective Order.

1 26. Attached hereto as Exhibit 14 is a true and correct copy of a January
2 19, 2018 document regarding Alternative Access Delivery Requests submissions to
3 the OIC, labeled CCH000522. This document is designated as “confidential” and
4 has been filed under seal pursuant to the February 27, 2019 Order Adopting
5 Stipulated Protective Order.

6 27. Attached hereto as Exhibit 15 is a true and correct copy of a February
7 1, 2018 document regarding Alternative Access Delivery Requests submissions to
8 the OIC, labeled CCH002310. This document is designated as “confidential” and
9 has been filed under seal pursuant to the February 27, 2019 Order Adopting
10 Stipulated Protective Order.

11 28. Attached hereto as Exhibit 16 is a true and correct copy of a February
12 19, 2018 document regarding Alternative Access Delivery Requests submissions to
13 the OIC, labeled CCH000534. This document is designated as “confidential” and
14 has been filed under seal pursuant to the February 27, 2019 Order Adopting
15 Stipulated Protective Order.

16 29. Attached hereto as Exhibit 17 is a true and correct copy of a March
17 29, 2018 document regarding Alternative Access Delivery Requests submissions to
18 the OIC, labeled CCH001919. This document is designated as “confidential” and
19 has been filed under seal pursuant to the February 27, 2019 Order Adopting
20 Stipulated Protective Order.

1 30. Attached hereto as Exhibit 18 is a true and correct copy of excerpts
2 from an April 6, 2018 document regarding Alternative Access Delivery Requests
3 submissions to the OIC, labeled CCH001279. This document is designated as
4 “confidential” and has been filed under seal pursuant to the February 27, 2019
5 Order Adopting Stipulated Protective Order.

6 31. Attached hereto as Exhibit 19 is a true and correct copy of excerpts
7 from an April 6, 2018 document and regarding Alternative Access Delivery
8 Requests submissions to the OIC, labeled CCH002458. This document is
9 designated as “confidential” and has been filed under seal pursuant to the February
10 27, 2019 Order Adopting Stipulated Protective Order.

11 32. Attached hereto as Exhibit 20 is a true and correct copy of excerpts
12 from an April 6, 2018 document and regarding Alternative Access Delivery
13 Requests submissions to the OIC, labeled CCH001023. This document is
14 designated as “confidential” and has been filed under seal pursuant to the February
15 27, 2019 Order Adopting Stipulated Protective Order.

16 33. Attached hereto as Exhibit 21 is a true and correct copy of excerpts
17 from the June 6, 2018 Alternative Access Delivery Request Form C, labeled
18 CCH016983. This document is designated as “confidential” and has been filed
19 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
20 Order.

1 34. Attached hereto as Exhibit 22 is a true and correct copy of excerpts
2 from the June 6, 2018 Alternative Access Delivery Request Form C, labeled
3 CCH001143. This document is designated as “confidential” and has been filed
4 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
5 Order.

6 35. Attached hereto as Exhibit 23 is a true and correct copy of excerpts
7 from the June 6, 2018 Alternative Access Delivery Request Form C, labeled
8 CCH000736. This document is designated as “confidential” and has been filed
9 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
10 Order.

11 36. Attached hereto as Exhibit 24 is a true and correct copy of an August
12 8, 2018 Alternative Access Delivery Request Form C, labeled CCH019698. This
13 document is designated as “confidential” and has been filed under seal pursuant to
14 the February 27, 2019 Order Adopting Stipulated Protective Order.

15 37. Attached hereto as Exhibit 25 is a true and correct copy of an August
16 8, 2018 Alternative Access Delivery Request Form C, labeled CCH002750. This
17 document is designated as “confidential” and has been filed under seal pursuant to
18 the February 27, 2019 Order Adopting Stipulated Protective Order.

19 38. Attached hereto as Exhibit 26 is a true and correct copy of excerpts
20 from an August 8, 2018 Alternative Access Delivery Request Form C, labeled

1 CCH002988. This document is designated as “confidential” and has been filed
2 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
3 Order.

4 39. Attached hereto as Exhibit 27 is a true and correct copy of excerpts
5 from an August 8, 2018 Alternative Access Delivery Request Form C, labeled
6 CCH003152. This document is designated as “confidential” and has been filed
7 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
8 Order.

9 40. Attached hereto as Exhibit 28 is a true and correct copy of excerpts
10 from an August 8, 2018 Alternative Access Delivery Request Form Ce, labeled
11 CCH003234. This document is designated as “confidential” and has been filed
12 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
13 Order.

14 41. Attached hereto as Exhibit 29 is a true and correct copy of excerpts
15 from an August 8, 2018 Alternative Access Delivery Request Form C, labeled
16 CCH003332. This document is designated as “confidential” and has been filed
17 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
18 Order.

19 42. Attached hereto as Exhibit 30 is a true and correct copy of excerpts
20 from the November 20, 2019 Deposition of Mary Wendt.

1 43. Attached hereto as Exhibit 31 is a true and correct copy of Centene's
2 2020 Hospital Based Anesthesiology Network Report for Thurston County filed
3 with the OIC.

4 44. Attached hereto as Exhibit 32 is a true and correct copy of Centene's
5 2020 Emergency Room Physician Network Report King and Spokane Counties,
6 filed with the OIC.

7 45. Attached hereto as Exhibit 33 is a true and correct copy of the
8 template that insurers are required to disseminate to insureds under the Balance
9 Billing Protection Act (WAC 284-43B-010).

10 46. Attached hereto as Exhibit 34 is a true and correct copy of a March
11 2018 email from Jennifer Carlisle to Ben Beasley, labeled CCH110112 and
12 marked as Exhibit 18 to the deposition of Mary Wendt. This document is
13 designated as "confidential" and has been filed under seal pursuant to the February
14 27, 2019 Order Adopting Stipulated Protective Order.

15 47. Attached hereto as Exhibit 35 is a true and correct copy of the Balance
16 Billing Protection Act, dated November 19, 2019.

17 48. Attached hereto as Exhibit 36 is a true and correct copy of Attachment
18 A to the Coordinated Care Corporation Compliance Plan, labeled CCH016486.
19 This document is designated as "confidential" and has been filed under seal
20 pursuant to the February 27, 2019 Order Adopting Stipulated Protective Order.

1 49. Attached hereto as Exhibit 37 is a true and correct copy of a
2 December 12, 2017 calendar event organized by Mary Wendt, labeled
3 CCH101174. This document is designated as “confidential” and has been filed
4 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
5 Order.

6 50. Attached hereto as Exhibit 38 is a true and correct copy of a January
7 19, 2018 letter from Paul Goebel of Coordinated Care, labeled CCH016502. This
8 document is designated as “confidential” and has been filed under seal pursuant to
9 the February 27, 2019 Order Adopting Stipulated Protective Order.

10 51. Attached hereto as Exhibit 39 is a true and correct copy of a draft
11 March 2018 Notice to Current and Former Members Response to Consent Order
12 from the Office of the Insurance Commissioner from Coordinated Care, labeled
13 CCH023761. This document is designated as “confidential” and has been filed
14 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
15 Order.

16 52. Attached hereto as Exhibit 40 is a true and correct copy of the
17 Ambetter Consent Letter Project, labeled CCH012747. This document is
18 designated as “confidential” and has been filed under seal pursuant to the February
19 27, 2019 Order Adopting Stipulated Protective Order.

1 53. Attached hereto as Exhibit 41 is a true and correct copy of a June 4,
2 2018 letter from Risk and Regulatory Consulting to a member, labeled
3 CCH023763. This document is designated as “confidential” and has been filed
4 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
5 Order.

6 54. Attached hereto as Exhibit 42 is a true and correct copy of a
7 spreadsheet containing a summary of member check requests, labeled
8 CCH050071. This document is designated as “confidential” and has been filed
9 under seal pursuant to the February 27, 2019 Order Adopting Stipulated Protective
10 Order.

11 55. Attached hereto as Exhibit 43 is a true and correct copy of a document
12 produced by Centene, labeled CCH048065. This document is designated as
13 “confidential” and has been filed under seal pursuant to the February 27, 2019
14 Order Adopting Stipulated Protective Order.

15 56. Attached hereto as Exhibit 44 is a true and correct copy of the 2018
16 Ambetter/Health Insurance Marketplace: SMART Program, labeled CCH050086.
17 This document is designated as “confidential” and has been filed under seal
18 pursuant to the February 27, 2019 Order Adopting Stipulated Protective Order.

19 57. Attached hereto as Exhibit 45 is a true and correct copy of a document
20 produced by Centene, labeled CCH047485. This document is designated as

1 “confidential” and has been filed under seal pursuant to the February 27, 2019
2 Order Adopting Stipulated Protective Order.

3 58. Attached hereto as Exhibit 46 is a true and correct copy of a January
4 25, 2017 Centene Work Process document, labeled CCH047992. This document is
5 designated as “confidential” and has been filed under seal pursuant to the February
6 27, 2019 Order Adopting Stipulated Protective Order.

7 59. Attached hereto as Exhibit 47 is a true and correct copy of excerpts
8 from the November 22, 2019 Deposition of Susanne Towill.

9 60. Attached hereto as Exhibit 48 is a true and correct copy of a document
10 produced by Centene, labeled CCH121397. This document is designated as
11 “confidential” and has been filed under seal pursuant to the February 27, 2019
12 Order Adopting Stipulated Protective Order.

13 61. Attached hereto as Exhibit 49 is a true and correct copy of a May 10,
14 2018 email from Dean Solis to Donovan Ayers, labeled CCH227991. This
15 document is designated as “confidential” and has been filed under seal pursuant to
16 the February 27, 2019 Order Adopting Stipulated Protective Order.

17 62. Attached hereto as Exhibit 50 is a true and correct copy of
18 Coordinated Care’s 2017 Evidence of Coverage, labeled CCH004994. This
19 document is designated as “confidential” and has been filed under seal pursuant to
20 the February 27, 2019 Order Adopting Stipulated Protective Order.

1 63. Attached hereto as Exhibit 51 is a true and correct copy of a screen
2 shot from Cynthia Harvey's Ambetter member page, labeled HARVEY_000157.

3 64. Attached hereto as Exhibit 52 is a true and correct copy of
4 Coordinated Care's April 9, 2017 Member Explanation of Benefits for Cynthia
5 Harvey, labeled CCH020062. This document is designated as "confidential" and
6 has been filed under seal pursuant to the February 27, 2019 Order Adopting
7 Stipulated Protective Order.

8 65. Attached hereto as Exhibit 53 is a true and correct copy of May 3,
9 2017 letter from the OIC to Coordinated Care Corporation, labeled CCH020067.
10 This document is designated as "confidential" and has been filed under seal
11 pursuant to the February 27, 2019 Order Adopting Stipulated Protective Order.

12 66. Attached hereto as Exhibit 54 is a true and correct copy of a May 11,
13 2017 letter from Coordinated Care to Cynthia Harvey, labeled HARVEY_000078.
14 This document is designated as "confidential" and has been filed under seal
15 pursuant to the February 27, 2019 Order Adopting Stipulated Protective Order.

16 67. Attached hereto as Exhibit 55 is a true and correct copy of Cynthia
17 Harvey's May 29, 2019 OIC Original Complaint Details, labeled
18 HARVEY_000115.

68. Attached hereto as Exhibit 56 is a true and correct copy of a June 19, 2019 letter from Coordinated Care to Karen Huber of the OIC regarding Cynthia Harvey, labeled HARVEY_000076.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED at Seattle, Washington, this 8th day of January, 2020.

/s/ Beth E. Terrell, WSBA #26759
Beth E. Terrell, WSBA #26759

1 CERTIFICATE OF SERVICE

2 I, Beth E. Terrell, hereby certify that on January 8, 2020, I electronically
3 filed the foregoing with the Clerk of the Court using the CM/ECF system which
4 will send notification of such filing to the following:

5 Maren Roxanne Norton, WSBA #35435
6 J. Scott Pritchard, WSBA #50761
7 Attorneys for Defendants
8 STOEL RIVES LLP
9 600 University Street, Suite 3600
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10 Steven M. Cady, *Admitted Pro Hac Vice*
11 Brendan V. Sullivan, Jr., *Admitted Pro Hac Vice*
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Email: bmurray@wc.com

1 DATED this 8th day of January, 2020.

2 TERRELL MARSHALL LAW GROUP PLLC

3 By: /s/ Beth E. Terrell, WSBA #26759

4 Beth E. Terrell, WSBA #26759

5 Attorneys for Plaintiff and the Class

6 936 North 34th Street, Suite 300

7 Seattle, Washington 98103

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